

Washington, D.C. 20250

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Mr. Greg Read
Executive Manager, Exports and Food Policy
Australian Quarantine and Inspection Service (AQIS)
Edmund Barton Building
GPO Box 858
Canberra ACT 2601
Australia

Dear Mr. Read:

The Food Safety and Inspection Service conducted an on-site audit of Australia's meat inspection system June 17 through August 3, 2004. Enclosed is a copy of the final audit report. We have included your comments of January 21, 2005, as an attachment to the final report.

If you have questions regarding the audit or audit report, please contact me by telephone at 202-720-3781, by facsimile at 202-690-4040, or by e-mail at sally.white@fsis.usda.gov.

Sincerely,

Sally White Director

International Equivalence Staff

Jacey White I

Office of International Affairs

Enclosure

cc: Andrew C. Burst, Counselor, American Embassy, Canberra

Dr. Andrew Cupit, Agricultural Counselor, Embassy of Australia, Washington, DC

Steve Huete, FAS Area Director

Amy Winton, State Department

Robert Macke, International Trade Policy, FAS

Barbara Masters, Acting Administrator, FSIS

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Linda Swacina, Executive Director – FSIA, OIA, FSIS

Country File (Australia Audit File - FY 2004)

# FINAL

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# FINAL REPORT OF AN AUDIT CARRIED OUT IN AUSTRALIA COVERING AUSTRALIA'S MEAT INSPECTION SYSTEM

June 17 through August 3, 2004

#### TABLE OF CONTENTS

- 1. INTRODUCTION
- 2. OBJECTIVE OF THE AUDIT
- 3. PROTOCOL
- 4. LEGAL BASIS FOR THE AUDIT
- 5. SUMMARY OF PREVIOUS AUDITS
- 6. MAIN FINDINGS
  - 6.1 Government Oversight
  - 6.2 Headquarters Audit
- 7. ESTABLISHMENT AUDITS
- 8. LABORATORY AUDITS
- 9. SANITATION CONTROLS
  - 9.1 SSOP
  - 9.2 Sanitation
- 10. ANIMAL DISEASE CONTROLS
- 11. SLAUGHTER/PROCESSING CONTROLS
  - 11.1 Humane Handling and Slaughter
  - 11.2 HACCP Implementation
  - 11.3 Testing for Generic Escherichia coli
  - 11.4 Testing for Listeria Monocytogenes
- 12. RESIDUE CONTROLS
- 13. ENFORCEMENT CONTROLS
  - 13.1 Daily Inspection
  - 13.2 Testing for Salmonella
  - 13.3 Species Verification
  - 13.4 Monthly Reviews
  - 13.5 Inspection System Controls
- 14. CLOSING MEETING
- 15. ATTACHMENTS TO THE AUDIT REPORT

#### ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA Central Competent Authority

AQIS Australian Quarantine and Inspection Service

FSIS Food Safety and Inspection Service

PR/HACCP Pathogen Reduction/Hazard Analysis and Critical Control Point

Systems

CCP Critical Control Point

CL Critical Limit

SSOP Sanitation Standard Operating Procedures

E. coli Escherichia coli

Salmonella species

#### 1. INTRODUCTION

The audit took place in Australia from June 17 through August 3, 2004.

An opening meeting was held on June 17, 2004, in Canberra with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Australia's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, Australian Quarantine and Inspection Service and/or representatives from the regional and local inspection offices.

#### 2. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, three regional inspection offices, one government residue laboratory, one private microbiology laboratory and one government microbiology laboratory performing analytical testing on United States-destined product, and 14 meat slaughter and/or processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	Regional	3	
	Autonomous Province	0	
	Local	0	Establishment level
Laboratories		3	
Meat Slaughter/Processing Est	ablishments	11	
Meat Processing Establishmen	ts	3	
Cold Storage Facilities		0	

#### 3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters or regional offices. The third part involved on-site visits to 14 establishments: 11 that were conducting both slaughter and processing activities and three that were conducting processing activities only. The fourth part involved visits to one government contracted residue laboratory and one government and one private

microbiology laboratories. The Institute of Medical and Veterinary Science, Adelaide and Opus MQT, East Brunswick, VIC, were conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*. The Amdel Limited, Clayton, VIC, was conducting analyses of field samples for Australia's national residue control program.

Program effectiveness determinations of Australia's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Australia's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditor also assessed how inspection services are carried out by Australia and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

At the opening meeting, the auditor explained that Australia's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Australia. FSIS requirements include, among other things, daily inspection in all certified establishments, monthly supervisory visits to certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella*.

Equivalence determinations are those that have been made by FSIS for Australia under provisions of the Sanitary/Phytosanitary Agreement. Australia has adopted the FSIS regulatory requirement for *Salmonella* testing with the exception of the following equivalent measures:

- 1. Establishment employees collect samples.
- 2. Private laboratories analyze samples.

#### 4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

#### 5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address: http/:www.fsis.usda.gov/Regulations & Policies/Foreign\_Audit Reports/index.asp

The last two audits of Australia's inspection system have shown some problems. Of the problems identified in the FSIS audit of February/March 2002, the following had been corrected by the audit in April/June 2003:

#### 2002

#### Sanitation Standard Operating Procedures

- 18 plants had non-compliances for daily records documentation of preventative measures as part of SSOP corrective actions.
- 5 incidences of non-compliances associated with implementation of SSOP's including monitoring of implementation where observed.

#### **HACCP**

- 18 observations of non-compliances for development and implementation of a written HACCP plan.
- One establishment did not adequately describe corrective actions
- One establishment did not document corrective actions
- In one establishment ingesta found after inspection non-compliance of verification

#### Generic *E. coli* testing

• In 11 establishments the *E. coli* procedures did not designate responsible employee and 13 establishments had no location for sample collection established.

#### SPS

- One establishment revealed mouse infestation in a storage building
- 3 establishments had equipment and utensils sanitary handling non-compliances.
- 3 establishments had sanitary operating procedures that could result in direct product contamination.

Implementation of HACCP is the only common deficiency noted in both the 2002 and 2003 reports.

#### 2003

#### **HACCP**

- 8 establishments had non-compliances in development and implementation of the HACCP plan.
- Two establishments had non-compliances of HACCP monitoring.
- FSIS laboratory testing methods were not being used for residue surveillance.
- In one establishment, condemned product was not being denatured properly.
- Problems were noted with inspection controls in 10 establishments relating to enforcement of HACCP, SSOP, and sanitation performance standards.
- In one establishment, condemned product was not being denatured properly.

#### 6. MAIN FINDINGS

#### 6.1 Government Oversight

All inspection veterinarians and inspectors in establishments certified by Australia to export meat products to the U.S. are full-time AQIS employees, receiving no remuneration from either industry or establishment personnel.

#### 6.1.1 CCA Control Systems

AQIS has the organizational structure and staffing to ensure uniform implementation of U.S. requirements.

#### 6.1.2 Ultimate Control and Supervision

AOIS has the ultimate legal control over and supervision of the official activities of all employees in certified establishments.

#### 6.1.3 Assignment of Competent, Qualified Inspectors

At the establishment level, the official veterinarians appeared to be trained but some were lacking enforcement abilities.

#### 6.1.4 Authority and Responsibility to Enforce the Laws

Nine of 14 establishments audited had inadequate enforcement of U.S. requirements.

#### 6.1.5 Adequate Administrative and Technical Support

AQIS has the ability to support a third-party audit.

#### 6.2 Headquarters Audit

The auditor conducted a review of inspection system documents at headquarters, regional offices and at inspection offices in the audited establishments. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the United States
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Sanitation, slaughter and processing inspection procedures and standards.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

Some concerns arose as a result the examination of these documents regarding the enforcement of FSIS requirements. The concerns are further documented in this report.

#### 6.3.1 Audit of Regional and Local Inspection Sites

The Regional Offices in Adelaide, South Australia; Sydney, New South Wales (NSW); and Perth, Western Australia were visited to discuss oversight and enforcement activities.

#### 7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 14 establishments. Eleven establishments were slaughter/processing establishments and three were processing only. One establishment was delisted by the AQIS because of less than daily inspection and the establishment's HACCP plan had not considered *Listeria monocytogenes* as a hazard likely to occur and had not incorporated the use of the antimicrobial agent or process to suppress or limit the growth of *Listeria monocytogenes*.

Three establishments received a Notice of Intent to Delist due to insufficient SSOP, HACCP, and *E. coli* implementation and documentation.

These establishments may retain their certification for export to the United States provided that they correct all deficiencies noted during the audit within 30 days of the date the establishment was reviewed, and corrective actions were verified by AQIS.

Specific deficiencies are noted in the attached individual establishment review forms.

#### 8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis was placed on the application of procedures and standards that are equivalent to United States' requirements.

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS PR/HACCP requirements.

The following laboratories were reviewed:

One government contracted residue laboratory and one government and one private microbiology laboratory were visited. The Institute of Medical and Veterinary Science, Adelaide and Opus MQT, East Brunswick, VIC, were conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*. The Amdel Limited, Clayton, VIC, was conducting analyses of field samples for Australia's national residue control program. The following methods were used for detection of generic *E. coli*, *E. coli* O157:H7, and *Salmonella* species:

- 1. Petri film plate method used for generic *E. coli* testing.
- 2. Method 996.09 AOAC official method, VIP for EHEC, used for E. coli O157:H7
- 3. The method used for *Salmonella* analysis was an FSIS approved method.

The following deficiencies were noted:

- In the Institute of Medical and Veterinary Science, Adelaide, there was no knowledge of the temperature of the receiving samples.
- In the Opus MQT, East Brunswick, VIC microbiology laboratory, pages were not numbered in the Log book.

#### 9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess Australia's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of establishments, and except as noted below, Australia's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

In addition, and except as noted below, Australia's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

#### 9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States domestic inspection program. The SSOP in seven establishments were found to meet the basic FSIS regulatory requirements with no deficiencies.

In the other six establishments, the following deficiencies were noted:

- Implementation of SSOPs, including monitoring of implementation, was deficient in six establishments.
- Corrective action when the SSOPs have failed to prevent direct product contamination was deficient in two establishments.
- Daily records did not document the SSOP deficiency in the boning area in one establishment.

#### 9.2 Sanitation

The following deficiencies were noted:

- In one establishment, a door connecting the shipping room with outside premises was continuously open.
- In one establishment, several rusty spots on the supportive structure and equipment were observed in the slaughter house and the boning room.
- In two establishments, there was insufficient or non-functional light at the antemortem suspect pen.
- In one establishment, spider webs were observed in the dressing room.
- In two establishments, cartons used for edible product were contacting the ceiling in the box storage/preparation room and plastic containers used for edible product were used for inedible purposes.

- In seven establishments, under sanitary operations category, there was a potential for direct product contamination and product was not properly protected from adulteration during processing.
- In two establishments, employees working with product or food-contact surfaces did not adhere to hygienic practices.
- In one establishment, a metal container used for inedible product was not designated as for inedible product only.

#### 10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Australia's inspection system had adequate controls in place with the exception of the following deficiencies:

- Non-ambulatory cattle were being slaughtered and processed in U.S. certified establishments. Although the live animals and resulting product was segregated from U.S. product, this does not meet current FSIS requirements.
- Retropharyngeal lateral (atlantal) lymph nodes were not incised in all slaughter establishments audited.
- During post-mortem inspection in two establishments, the heads were not identified with the carcasses.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

#### 11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures; ante-mortem disposition; post-mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of a generic *E. coli* testing program in slaughter establishments.

#### 11.1 Humane Handling and Slaughter

No deficiencies were noted.

#### 11.2 HACCP Implementation.

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the 14 establishments. Eight establishments had adequately implemented the HACCP requirements. The other six establishments had the following deficiencies:

- In two establishments, direct observation of monitoring activities, and calibration of process-monitoring equipment and their frequencies were not addressed in the HACCP plan.
- In two establishments, calibration of process-monitoring equipment and the frequency of calibration were not addressed in the HACCP plan, even though the calibration of process monitoring equipment was being performed.
- In one establishment, a hazard for *Listeria monocytogenes* had not been considered in its HACCP plan and the establishment had not incorporated the use of an antimicrobial agent or process to suppress or limit the growth of *Listeria monocytogenes*.
- In one establishment, prevention of milk contamination was determined as a Critical Control Point (CCP), with a critical limit (CL), but monitoring, corrective action, and verification were not described in the HACCP plan.
- In one establishment, the HACCP plan CCP critical limit was a carcass surface temperature of 7°C in 24 hours, while a temperature of 8.8°C in 18 hours is recorded as the CL in the monitoring records. Establishment officials have not been initiating corrective action for deviations from the CL listed in the HACCP plan.

#### 11.3 Testing for Generic E. coli

Australia has adopted the FSIS regulatory requirements for generic *E. coli* testing.

Eleven of the 14 establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in 10 of the 11 slaughter establishments with the following deficiencies:

• In one establishment, there was no clear understanding of the use of "m" and "M" for the generic *E. coli* testing program and no proper corrective action was taken when deviation occurs.

• In the Institute of Medical and Veterinary Science, Adelaide, laboratory employees were not recording the temperature of samples for generic *E. coli* testing at the time of receipt.

#### 11.4 Testing for *Listeria monocytogenes*

One of the 14 establishments audited was producing ready-to-eat products for export to the United States.

• However, the HACCP plans in this establishment had not been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur, in accordance with FSIS requirements. The establishment had not incorporated the use of an antimicrobial agent or process to suppress or limit the growth of *Listeria monocytogenes* in its HACCP plan.

#### 12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

The Amdel Limited, Clayton, VIC, was conducting analyses of field samples for Australia's national residue control program.

No deficiencies were noted.

Australia's National Residue Testing Plan for 2004 was being followed and was on schedule.

#### 13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella*.

#### 13.1 Daily Inspection in Establishments

Daily inspection was being conducted in all slaughter and processing establishments with the exception of one processing establishment.

#### 13.2 Testing for Salmonella

Australia has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measure(s).

- 1. Establishment employees collect samples.
- 2. Private laboratories analyze samples.

Eleven of the 14 establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for Salmonella was properly conducted in all 14 establishments.

#### 13.3 Species Verification

Species verification was being conducted in those establishments in which it was required.

#### 13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

#### 13.5 Inspection System Controls

The CCA had controls in place for ante-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

• Nine of 14 establishments audited had inadequate enforcement of some aspects of U.S. requirements.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other counties for further processing.

Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

#### 14. CLOSING MEETING

A closing meeting was held on August 3, 2004, in Canberra with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Oto Urban International Audit Staff Officer (gary D. Bolstad D.V.M. or Oto Urban D.V.M.)

## 15. ATTACHMENTS

Individual Foreign Establishment Audit Forms Individual Foreign Laboratory Reports Foreign Country Response to Draft Final Audit Report

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FOREIGN GOV'T AGENCY AQIS

CITY & COUNTRY

Adelaide, South Australia

ADDRESS OF LABORATORY Apelaide, South Australia

NAME OF REVIEWER Dr. Oto Urban

NAME OF FOREIGN OFFICIAL

Dr. John Dorian

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1 (A) Date 10/2/04																							ADDRESS OF LABORATORY  2 Alsace St. East Brunswick	

FORE	F REVIEWER NAME OF F Urban Dr. Roger		REVIEW DATE 07/06/04	NAME OF FOREIGN LABORATORY  Cous MQT
FOREIGN GO AQIS		CITY & COUNT East Brunswi		ADDRESS OF LABORATORY 2 Alsace St., East Brunswick
NAME OF RE		NAME OF FORI Dr. Roger Tu		
RESIDUE	ITEM NO.			COMMENTS
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				A = acceptable
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#### United States Department of Agriculture Food Safety and Inspection Service

Wingham, NSW 1499   1	1. ESTABLISHMENT NAME AND LOCATION	2. AJDIT DATE	3. E	STABL SHMENT N	O. 4. NAME OF COUNTRY	
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60. Observation of the Establishment

Australia, Est. 154

06-30-04

No comments were necessary.

61. NAME OF AUDITOR

(19<sup>1</sup> Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

022/2018/16/09 Chariday 15/10/09

#### United States Department of Agriculture Food Safety and Inspection Service

	ESTABLISHMENT NAME AND LOCATION	2. AUDIT	DATE	3 E	STABLISHMENT NO	D. 4. NAME OF COUNTRY	
	Pace Trading PTY. LTD	06 - 22 -		1	62	Australia	
	Royal Park,	5. NAME C	OF AUDITO	R(S)		6. TYPE OF AUDIT	
,	South Australia	Dr. O	to Urban	1		X ON-SITE AUDIT	DOCUMENT AUDIT
Pla	ace an X in the Audit Results block to inc	licate no	ncompl	iand	e with requir	ements. Use O if not ap	plicable.
Pai	rt A - Sanitation Standard Operating Procedures ( Basic Requirements	SSOP)	Audit Results			Part D - Continued Economic Sampling	Audit Results
7.	Written SSOP		-	33.	Scheduled Sample		: 0
8.	Records documenting implementation.			34.	Species Testing		
9.	Signed and dated SSOP, by on-site or overall authority.			35.	Residue		0
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	Implementation of SSOP's, including monitoring of implemen	ntation.	X	36.	Export		
	Maintenance and evaluation of the effectiveness of SSOP's.			37.	Import		
12.	Corrective action when the SSOPs have faled to prevent disproduct contamination or adulteration.	rect		38.	Establishment Grou	unds and P⇔t Control	X
13.	Daily records document item 10, 11 and 12 above.			39.	Establishment Con	struction/Maintenance	X
	Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			<del> </del>	Light		
14.	Developed and implemented a written HACCP plan .		İ	L.	Ventilation		
15.	Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective ac	tions.		[	Plumbing and Sewa	age	
16.	Records documenting implementation and monitoring of the HACCP plan.		X	<u> </u>	Water Supply  Dressing Rooms/La	avatories	i
17.	The HACCP plan is signed and dated by the responsible establishment individual.				Equipment and Ute		X
	Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			46.	Sanitary Operations	3	X
18.	Monitoring of HACCP plan.			47.	Employee Hygiene		
19.	Verification and validation of HACCP plan.			48.	Condemned Produc	et Control	
20.	Corrective action written in HACCP plan.		:	<u> </u>			
21.	Reassessed adequacy of the HACCP plan.				Part	- Inspection Requirements	
22.	. Records documenting: the written HACCP plan, monitoring of critical control points, dates and times of specific event occur	f the rrences.		49.	Government Staffin	g	
	Part C - Economic / Wholesomeness			50.	Daily Inspection Co	verage	
23.	Labeling - Product Standards			51.	Enforcement		X
24.	Labeling - Net Weights			52	Humane Handling		
	General Labeling			V2.			0
26.	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moi	sture)		53.	Animal Identification	1	0
	Part D - Sampling Generic <i>E. coli</i> Testing			54.	Ante Mortem Inspec	ction	0
27.	Written Procedures		0	55.	Post Mortem Inspec	etion	0
28.	Sample Collection/Analysis		0				
29.	Records		0		Part G - Other R	egulatory Oversight Requiren	ients
S	Salmonella Performance Standards - Basic Requir	ements		56.	European Communit	y Directives	0
30.	Corrective Actions		· O	57.	Monthly Review		
31.	Ressessment		0	58.	NOID		X
32.	Written Assurance		0	59.			

60. Observation of the Establishment

Australia, Est. 162

06-22-04

- 10/51 Daily records to document monitoring, and corrective action during the pre-operation and operation sanitation did not reflect the real situation in the cryovac processing room. Additionally, daily records did not indicate any preventive action after the repeated deficiency. Establishment management will correct these deficiencies (416.16).
- 16/51 Direct observation of monitoring activities, calibration of process-monitoring equipment and their frequencies were not address in the HACCP plan, even though the calibration of process monitoring equipment is being performed (417.2). This deficiency is going to be corrected by the establishment management.
- 38 The side door to the outside was repeatedly left open by the establishment employees, despite they were directed to keep it close by the AQIS representative (416.4d).
- 39/51 Flaking paint was observed over the possible product way in the pre-trim room. This deficiency was scheduled for correction by the establishment management (416.3b).
- 45 Metal container used for inedible product was not designated as for inedible product only in the boning room. This deficiency was corrected immediately by the establishment management (416.3c).
- 45/51 Rusty cart, sink, and sanitizer were observed in the species testing room. This deficiency was scheduled for correction by the establishment management (416.3b).
- An employee was observed to control condensation by wiping out the ceiling of the cooler, then contacting the drain with the wiping instrument and without sanitizing it, he continued to wipe out the ceiling. The product was located in the other end of the cooler. Corrective action was taken by the AOIS representative (416.13).
- 58 This establishment was issued Notice to Intend Delist (NOID) for sanitation and HACCP deficiencies.

62. AUDITOR SIGNATURE AND DATE

## United States Department of Agriculture Food Safety and Inspection Service

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY	
Tasman Group Services,	07 - 22 - 04	195	Australia	
Longford,	5. NAMÉ OF AUDIT	DR(S)	6. TYPE OF AUDIT	
Tasmania, Australia		•		
	Dr. Oto Urba	n	X ON-SITE AUDIT 5	DOCUMENT AUDIT
Place an X in the Audit Results block to in	dicate noncomp	liance with requiren	nents. Use O if not appl	licable.
Part A - Sanitation Standard Operating Procedures  Basic Requirements	(SSOP) Audit Results	1	art D - Continued conomic Sampling	Audit Resurts
7. Written SSOP		33. Scheduled Sample		
8. Records documenting implementation.		34. Species Testing	The second secon	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue		
Sanitation Standard Operating Procedures (SSOP Ongoing Requirements	)	Part E	- Other Requirements	!
10. Implementation of SSOP's, including monitoring of impleme	entation.	36. Export		i
11. Maintenance and evaluation of the effectiveness of SSOP's	5,	37. Import		
<ol> <li>Corrective action when the SSOPs have failed to prevent oppoduct contamination or adulteration.</li> </ol>	direct	38. Establishment Grounds	s and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Constru	iction/Maintenance	1 1 1 1 1 1
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light		
14. Developed and implemented a written HACCP plan.		41. Ventilation		
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective a	actions.	42. Plumbing and Sewage		: 
<ol> <li>Records documenting implementation and monitoring of the HACCP plan.</li> </ol>	e	43. Water Supply		
The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Roms/Lavat  45. Equipment and Utensii		
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46. Sanitary Operations		X
18. Monitoring of HACCP plan.		47. Employee Hygiene		
19. Verification and validation of HACCP plan.		48. Condemned Product C		
20. Corrective action written in HACCP plan.		48. Condemned Froduct C	Official	
21. Reassessed adequacy of the HACCP plan.		Part F - I	Inspection Requirements	
Records documenting: the written HACCP plan, monitoring critical control points, dates and times of specific event occ		49. Government Staffing		
Part C - Economic / Wholesomeness		50. Daily Inspection Cover.	age	
23. Labeling - Product Standards		<b>1</b>	-	
24. Labeling - Net Weights		51. Enforcement		
25. General Labeling		52. Humane Handling		
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mo	oisture)	53. Animal Identification		
Part D - Sampling Generic <i>E. coli</i> Testing		54. Ante Mortem Inspection	n	
27. Written Procedures		EE Dood Markey Language		
		55. Post Mortem Inspection	II	
28. Sample Collection/Analysis		Part G - Other Regu	ulatory Oversight Requiremen	nts
29. Records				
Salmonella Performance Standards - Basic Requ	irements	56. European Community D	Prectives	0
30. Corrective Actions		57. Monthly Review		
31. Reassessment		58.		
32. Written Assurance		59.		_
	<del></del>			

60. Observation of the Establishment

07-22-04

Australia, Est. 195

46/51 A conveyor belt used for edible product in the boning room was observed with several deep gouges, and was in need of replacement. This was scheduled for correction by the inspection service officials. [(Regulatory reference: 9 CFR 416.4 (d)].

61. NAME OF AUDITOR

Dr. Ote Urban ل

62. AUDITOR SIGNATURE AND DATE

#### United States Department of Agriculture Food Safety and Inspection Service

1. ESTABLISHMENT NAME AND LOCATION	2. AUD T DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY	
John Dee Warwick P/L	07 ~ 26 - 04	243	Australia	
Warwick,	5. NAME OF AUDITO	DR(S)	8. TYPE OF AUDIT	
Queensland, Australia	Dr. Oto Urbai	1	X ON-SITE AUDIT DOC	DUMENT AUDIT
Place an X in the Audit Results block to	indicate noncomp	liance with requirer	ments. Use O if not applica	able.
Part A - Sanitation Standard Operating Procedure Basic Requirements	s (SSOP) Audit Results	1	Part D - Continued conomic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample		
8. Records documenting implementation.	·	34. Species Testing		
9. Signed and dated SSOP, by on-site or overall authority.	:	35. Residue		
Sanitation Standard Operating Procedures (SSC Ongoing Requirements	P)	Part E	- Other Requirements	
10. Implementation of SSOP's, including monitoring of imple	mentation.	36. Export		
11. Maintenance and evaluation of the effectiveness of SSOF	oʻs.	37. Import		
<ol> <li>Corrective action when the SSOPs have falled to preven product contamination or adulteration.</li> </ol>	t direct	38. Establishment Ground	ds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	!	39. Establishment Constru	ruction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light		
14. Developed and implemented a written HACCP plan.		41. Ventilation		
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective.	actions.	42. Plumbing and Sewage	9	- 1
<ol> <li>Records documenting implementation and monitoring of HACCP plan.</li> </ol>	the	43. Water Supply		
The HACCP plan is signed and dated by the responsible establishment individual.	:	44. Dressing Rooms/Lava 45. Equipment and Utensi		X
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46. Sanitary Operations		
18. Monitoring of HACCP plan.		47. Employee Hygiene		
19. Verification and validation of HACCP plan.		48. Condemned Product C	Control	
20. Corrective action written in HACCP plan.				
21. Reassessed adequacy of the HACCP plan.		Part F -	Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring critical control points, dates and times of specific event of		49. Government Staffing		
Part C - Economic / Wholesomeness		50. Daily Inspection Cove	rage	
23. Labeling - Product Standards		51. Enforcement		- <u>-</u> -
24. Labeling - Net Weights				
25. General Labeling		52. Humane Handling		
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/	Moisture)	53. Animal Identification		
Part D - Sampling Generic <i>E. coli</i> Testing		54. Ante Mortem Inspectio	on	
27. Written Procedures		55. Post Mortem Inspectio	on .	
28. Sample Collection/Analysis		oo. Took Mortan mapeono		·
	:	Part G - Other Reg	ulatory Oversight Requirements	•
29. Records				
Salmonella Performance Standards - Basic Req	uirements	56. European Community I	Directives	0
30. Corrective Actions		57. Monthly Review		
31. Reassessment		58.		
32. Written Assurance		59.		

60. Observation of the Establishment

Australia. Est. 243

45 Plastic containers/tubs were used in some cases for edible and inedible material. This deficiency was immediately corrected by the establishment management (416.3c).

61. NAME OF AUDITOR

Dr Oto Tirban

62. AUDITOR SIGNATURE AND DATE

Miangras H. Chaudry 16/1404

#### United States Department of Agriculture Food Safety and Inspection Service

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY		
Midfield Meat International Pty, Ltd	07 - 07 - 04	246	Australia		
Warrnambool 3280	5. NAME OF AUDITO	DR(S)	6. TYPE OF AUDIT		
Victoria, Australia	Dr. Oto Urbar		V		
			MENT AUDIT		
Place an X in the Audit Results block to inc	•	· ·		le.	
Part A - Sanitation Standard Operating Procedures (SSOP)  Basic Requirements  Audit Results			art D - Continued onomic Sampling	Audit Results	
7. Written SSOP		33. Scheduled Sample			
8. Records documenting implementation.	:	34. Species Testing			
9. Signed and dated SSOP, by on-site or overall authority.	<del></del>	35. Residue			
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements			
10. Implementation of SSOP's, including monitoring of impleme	ntation. X	36. Export			
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import			
<ol> <li>Corrective action when the SSOP's have falled to prevent di product contamination or adulteration.</li> </ol>	rect	38. Establishment Grounds and Pest Control			
13. Daily records document item 10, 11 and 12 above.	i	39. Establishment Construction/Maintenance			
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light			
14. Developed and implemented a written HACCP plan .		41. Ventilation			
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage			
<ol> <li>Records documenting implementation and monitoring of the HACCP plan.</li> </ol>	į	43. Water Supply			
The HACCP plan is signed and dated by the responsible establishment individual.		<ul><li>44. Dressing R∞ms/Lavatories</li><li>45. Equipment and Utensils</li></ul>			
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46. Sanitary Operations			
18. Monitoring of HACCP plan.		47. Employee Hygiene			
19. Verification and validation of HACCP plan.		48. Condemned Product Co	ontrol		
20. Corrective action written in HACCP plan.					
21. Reæssessed adequacy of the HACCP plan.		Part F - II	nspection Requirements		
22. Records documenting: the written HACCP plan, monitoring of critical control points, dates and times of specific event occur.		49. Government Staffing			
Part C - Economic / Wholesomeness		50. Daily Inspection Covera	age		
23. Labeling - Product Standards		51. Enforcement			
24. Labeling - Net Weights		1,000			
25. General Labeling		52. Humane Handling			
26. Fin. Prod. Standards/Boneiess (Defects/AQL/Pork Skins/Mo	isture)	53. Animal Identification			
Part D - Sampling Generic <i>E. coli</i> Testing	ļ	54. Ante Mortem Inspection			
27. Written Procedures		55. Post Mortem Inspection			
28. Sample Collection/Analysis					
29. Recoras		Part G - Other Regu	latory Oversight Requirements		
Salmonella Performance Standards - Basic Requirements		56. European Community Di	rectives	0	
30. Corrective Actions		57. Monthly Review			
31. Ræssessment		58.			
32. Written Assurance		59.			

60. Observation of the Establishment

Australia, Est. 246 07-07-04

10 Condensation had formed directly above carcasses in a cooler. An employee was observed attempting to wipe the condensation without first moving the carcasses from the affected area, causing the condensation to drip onto the carcasses. The establishment management took immediate corrective actions. (Regulatory reference: 9 CFR 416.15)

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

Manger H. Chaudist 10/10/64

#### United States Department of Agriculture Food Safety and Inspection Service

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ES	TABLISHMENT NO. 4. NAME OF COUNTRY			
Bolphs Meat Company	07 - 08 - 04		) Australia			
Seymour	5. NAME OF AUD. TOR Australia Dr. Oto Urban		6. TYPE OF AUDIT			
Victoria, Australia			X ON-SITE AUDIT DOCU	UMENT AUDIT		
Place an X in the Audit Results block to inc	dicate noncomp	oliance	with requirements. Use O if not applica	ble.		
Part A - Sanitation Standard Operating Procedures (SSOP)  Audit Results		5	Part D - Continued Economic Sampling	Audit Results		
7. Written SSOP		33.	Scheduled Sample			
8. Records documenting implementation.	· · · · · · · · · · · · · · · · · · ·	34.	Species Testing			
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue			
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E - Other Requirements			
10. Implementation of SSOP's, including monitoring of impleme	ntation.	36.	Export			
11. Maintenance and evaluation of the effectiveness of SSOP's.		37.	mport			
Corrective action when the SSOPs have faled to prevent direct product contamination or adulteration.  X		38.	38. Establishment Grounds and Pest Control			
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance				
Part B - Hazard Analysis and Critical Control		40.	ight	X		
Point (HACCP) Systems - Basic Requirements  14. Developed and implemented a written HACCP plan.		41. `	/entilation ·			
Developed and implemented a written HACCP plan.      Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42.	Plumbing and Sewage			
16. Records documenting implementation and monitoring of the HACCP plan.		43.	Nater Supply			
The HACCP plan is signed and dated by the responsible establishment individual.		-	Dressing Rooms/Lavatories  Equipment and Utensils	X		
Hazard Analysis and Critical Control Point		45.	Equipment and Otensiis			
(HACCP) Systems - Ongoing Requirements		46.	Sanitary Operations	·		
18. Monitoring of HACCP plan.		47. 1	Employee Hygiene			
19. Verification and validation of HACCP plan.		48. (	Condemned Product Control			
20. Corrective action written in HACCP plan.	i					
21. Reassessed adequacy of the HACCP plan.	i		Part F - Inspection Requirements			
<ol> <li>Records documenting: the written HACCP plan, monitoring a critical control points, dates and times of specific event occ</li> </ol>	of the urrences.	49. (	Government Staffing			
Part C - Economic / Wholesomeness		50. [	Daily Inspection Coverage	i		
23. Labeling - Product Standards		51. [	Enforcement	X		
24. Labeling - Net Weights		52 1	Humane Handling			
25. General Labeling		32.				
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mo	pisture)	53. /	Animal Identification	~_ · · · · · · · · · · · · · · · · · · ·		
Part D - Sampling Generic <i>E. coli</i> Testing	:	54. A	Ante Mortem Inspection			
27. Written Procedures		55. F	Post Mortem Inspection	X		
28. Sample Collection/Analysis			Part G - Other Regulatory Oversight Requirements			
29. Records		'	-art G - Other Regulatory Oversight Requirements			
Salmonella Performance Standards - Basic Requirements		56. E	uropean Community Directives	0		
30. Corrective Actions		57. M	Monthly Review	· · · · · · · · · · · · · · · · · · ·		
31. Reassessment		58.	NOID	X		
32. Written Assurance		59.				

#### 60. Observation of the Establishment

Australia, Est. 260

07-08-04

- 12 Hair and grease were not properly trimmed from carcasses at the pre-trim check station and passed for boning operation. This deficiency was corrected by the inspection service representative (416.15a).
- 40/51 Light was not functional over the suspect pen at the ante-mortem (416.2c).
- 44/51 Spider webs were observed in the dressing room. This deficiency was neither recorded in the establishment sanitation records nor in the Inspection Service records (416.2h).
- 45/51 No sufficient number of knife sanitizers was observed in the boning room. Additionally, there was no written program for cleaning hooks used for edible product. This deficiency was scheduled for corrective action (416.13).
- 55/51 The heads were not clearly identified during the post-mortem inspection. This deficiency was corrected by the Inspection Service representative (310.2).
- 58 This establishment was issued Notice of Intent Delist for the above noted deficiencies.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

Miangers H. Chairly while

# United States Department of Agriculture Food Safety and Inspection Service

- 04 DE AUDITO Oto Urban	294 R(S)	Australia 6. TYPE OF AUDIT				
	R(S)	6. TYPE OF AUDIT				
to Urban						
		X ON-SITE AUDIT DOCUM	MENT AUDIT			
ncompl	iance with requirem	<u> </u>	e.			
Audit Results			Audit Results			
	33. Scheduled Sample					
	34. Species Testing					
Signed and dated SSOP, by on-site or overall authority.			35. Residue			
	Part E - Other Requirements					
Ongoing Requirements  10. Implementation of SSOP's, including monitoring of implementation.			36. Export			
	37. Import					
	38. Establishment Grounds	and Pest Control				
	39. Establishment Construc	tion/Maintenance				
77.00	40. Light		X			
	41. Ventilation		!			
X	42. Plumbing and Sewage					
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply				
The HACCP plan is signed and dated by the responsible establishment individual.						
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46. Sanitary Operations				
	47 Employee Hygiene					
19. Verification and validation of HACCP plan.						
X	48. Concerned Product Control					
	Part F - In	spection Requirements				
·	49. Government Staffing					
	50. Daily Inspection Coverage	ge				
	51 Enforcement					
			. X			
	52. Humane Handling					
	53. Animal Identification					
	54. Ante Mortem Inspection					
27. Written Procedures						
1	Part G - Other Regu	latory Oversight Requirements				
:	56. European Community Dir	rectives	0.			
	57. Monthly Review					
	58.					
	59.					
	X X	Audit Results  33. Scheduled Sample  34. Species Testing  35. Residue  Part E -  36. Export  37. Import  38. Establishment Grounds  39. Establishment Construct  40. Light  41. Ventilation  X 42. Plumbing and Sewage  43. Water Supply  44. Dressing Rooms/Lavato  45. Equipment and Utensils  46. Sanitary Operations  47. Employee Hygiene  48. Condemned Product Co  X  Part F - Ir  49. Government Staffing  50. Daily Inspection Covera  51. Enforcement  52. Humane Handling  53. Animal Identification  54. Ante Mortem Inspection  55. Post Mortem Inspection  Part G - Other Regul  56. European Community Dir  57. Monthly Review  58.	Results   Economic Sampling   33   Scheduled Sample   34   Species Testing   35   Residue   Part E - Other Requirements   36   Export   37   Import   38   Establishment Grounds and Pest Control   39   Establishment Construction/Maintenance   40   Light   41   Ventilation   X   42   Plumbing and Sewage   43   Water Supply   44   Dressing Rooms/Lavatories   45   Equipment and Utensilis   46   Sanitary Operations   47   Employee Hyglene   48   Condemned Product Control   X   Part F - Inspection Requirements   49   Government Staffing   50   Daily Inspection Coverage   51   Enforcement   52   Humane Handling   53   Animal Identification   54   Ante Mortem Inspection   55   Post Mortem Inspection   Part G - Other Regulatory Oversight Requirements   56   European Community Directives   57   Monthly Review   58			

07-27-04

Australia, Est. 294

- Milk was determined as a CCP, with CL but monitoring, corrective action, and verification were not 15/51 described. This deficiency was scheduled for correction by the establishment (417.2,c 4,5).
- The HACCP's CCP2 critical limit was carcass surface temperature of 7°C in 24hrs, while temperature of 20/51 8.8°C in 18 hrs is recorded as CL in monitoring records and there is no response by taking the corrective action to the deviation. This deficiency was scheduled for corrective action by the establishment management (417.3a 1,2).
- Light of sufficient intensity has to be provided to the suspect pen on the ante-mortem inspection (416.2b, 4c). 40/51

62. AUDITOR SIGNATURE AND DATE

H - Chaulif Topoley

1.	ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3.	ESTABLISH	MENTING, 4, NAME OF COL	INTRY	
	Westmeats, Pty, Ltd,	07 - 13 - 04		297	Australia		
	Thomastown,	5 NAME OF AUDITO		S)	6. TYPE OF AUD	7. <del>T</del>	
	Victoria, Australia	D 0: 171					
		Dr. Oto U			X ON-SITE AL		TICUA THE
	ace an X in the Audit Results block to in		mplia	nce with			;. 
Pa	rt A - Sanitation Standard Operating Procedures  Basic Requirements		udit sults		Part D - Continued Economic Samplin		Augit Results
7.	Written SSOP		3	3. Schedule			
8.	Records documenting implementation.	!	3	4. Species T	resting		
9.	Signed and dated SSOP, by on-site or overall authority.		3	5. Residue			0
S	anitation Standard Operating Procedures (SSOP Ongoing Requirements	)			Part E - Other Requiren	nents	i i
10	Implementation of SSOP's, including monitoring of impleme	entation.	3	6. Export			
11	. Maintenance and evaluation of the effectiveness of SSOP's	j	3	7. Import			
12	Corrective action when the SSOPs have falled to prevent of product contamination or adulteration.	lirect	3	8. Establishr	ment Grounds and Pest Control		
13	Daily records document item 10, 11 and 12 above.	<del></del>	3	9. Establishr	ment Construction/Maintenance		
	Part B - Hazard Analysis and Critical Control		4	0. Light			
11	Point (HACCP) Systems - Basic Requirements  Developed and implemented a written HACCP plan.		4	1. Ventilation	n		
	Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective a	retions	4	2. Plumbing	and Sewage		
16	Records documenting implementation and monitoring of the		4	3. Water Su	pply		
17	HACCP plan.  The HACCP plan is signed and dated by the responsible		4	4. Dressing	Roms/Lavatories		
	establishment individual.  Hazard Analysis and Critical Control Point		4	5. Equipmen	it and Utensils		
	(HACCP) Systems - Ongoing Requirements		4	6. Sanitary (	Operations		
18	Monitoring of HACCP plan.		4	7. Employee	Hygiene		
19	Verification and validation of HACCP plan.		4	8. Condemn	ed Product Control		
20	Corrective action written in HACCP plan.						
21.	Reassessed adequacy of the HACCP plan.	1			Part F - Inspection Requi	rements	
22	Records documenting: the written HACCP plan, monitoring critical control points, dates and times of specific event occ	of the currences	4	9. Governme	ent Staffing		
	Part C - Economic / Wholesomeness		5	0. Daily Insp	ection Coverage		
23.	Labeling - Product Standards	i i	5	1. Enforceme	ent		
24.	Labeling - Net Weights		<u> </u>				
25.	General Labeling			2. Humane l			0
26	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mo	oisture)	5	3. Animal ide	entification		0
	Part D - Sampling Generic <i>E. coli</i> Testing		5-	4. Ante Mort	em Inspection		0
27.	Written Procedures	0	5	5. Post Morte	em Inspection		0
28.	Sample Collection/Analysis	0					
29.	Records	0		Part G -	Other Regulatory Oversight	:Requirements	
	Salmonella Performance Standards - Basic Requ	irements	56	. European (	Community Directives		0
30.	Corrective Actions	0	5	7. Monthly R	eview	•	
31.	Ræssessment	0	58	3.			
32.	Written Assurance	0	59	).			

Australia, Est. 297 07-13-04

No comments were necessary.

61. NAME OF AUDITOR

Dr. Oto Urban

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3, ES	TABLISHMENT NO. 4. NAME OF COUNTRY	
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Part A - Sanitation Standard Operating Procedures Basic Requirements	(SSOP) Audit Results		Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33.	Scheduled Sample	
8. Records documenting implementation.		34.	Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35.	Residue	
Sanitation Standard Operating Procedures (SSOF Ongoing Requirements	P)		Part E - Other Requirements	İ
10. Implementation of SSOP's, including monitoring of implem	entation.	36.	Export	
11. Maintenance and evaluation of the effectiveness of SSOP's	s.	37.	Import	
<ol> <li>Corrective action when the SSOPs have failed to prevent oppoduct contamination or adulteration.</li> </ol>	direct	38.	Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39.	Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40.		
14. Developed and implemented a written HACCP plan.		41.	Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective a	actions.	42.	Plumbing and Sewage	
<ol> <li>Records documenting implementation and monitoring of th HACCP plan.</li> </ol>	n <b>e</b>		Water Supply	
The HACCP plan is signed and dated by the responsible establishment individual.		-	Dressing Roms/Lavatories  Equipment and Utensils	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		-	Sanitary Operations	
18. Monitoring of HACCP plan.		47	Employee Hygiene	
19. Verification and validation of HACCP plan.			Condemned Product Control	
20. Corrective action written in HACCP plan.	i			
21. Reassessed adequacy of the HACCP plan.			Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring critical control points, dates and times of specific event oc		49.	Government Staffing	
Part C - Economic / Wholesomeness		50.	Daily Inspection Coverage	1
23. Labeling - Product Standards	:	51	Enforcement	
24. Labeling - Net Weights				<del>-  </del>
25. General Labeling		52.	Humane Handling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/M	oisture)	53.	Animal Identification	
Part D - Sampling Generic <i>E. coli</i> Testing		54.	Ante Mortem Inspection	
27. Written Procedures		55.	Post Mortem Inspection	
28. Sample Collection/Analysis				
29. Records		] '	Part G - Other Regulatory Oversight Requirements	
Salmonella Performance Standards - Basic Requirements			uropean Community Directives	0
30. Corrective Actions		57.	Manthly Review	
31. Reassessment		58.		
32. Written Assurance		59.		

Australia, Est. 486

06-29-04

No comments were necessary.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

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Australia, Est. 533 06-21-04

- 16/51 Direct observations of monitoring activities were not addressed in the HACCP plan, even while it is being performed. This deficiency was scheduled for correction (9 CFR 417.2).
- 46/51 Several rusty spots on the supportive structure and equipment (wheelbarrow) were observed in the slaughter house and the boning room. These deficiencies were either corrected immediately or were scheduled for corrective action. (9 CFR 416.2b) and (416.3).

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

oriangedr H. Chaudry 16/10/04

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ≘	STABLISHMENT NO. 4. NAME OF COUNTRY				
E G Green & Sons Pty Ltd. 07 – 19 – 04		6	Australia				
Harvey, Western Australia	5. NAME OF AUDIT		6. TYPE OF AUDIT				
Dr. Oto Urbar		an	ON-SITE AUDIT DOCUM	MENT AUDIT			
Place an X in the Audit Results block to	indicate noncomp	plian	ce with requirements. Use O if not applicabl	e.			
Part A - Sanitation Standard Operating Procedur			Part D - Continued	Audit			
Basic Requirements  7 Written SSOP	Results		Economic Sampling	Results			
			Scheduled Sample				
8. Records documenting implementation.			Species Testing	<u>-</u>			
<ol> <li>Signed and dated SSOP, by on-site or overall authority.</li> <li>Sanitation Standard Operating Procedures (SS</li> </ol>	OB)	35.	Residue				
Ongoing Requirements	OF)		Part E - Other Requirements				
10. Implementation of SSOP's, including monitoring of imple	ementation, X	36.	Export				
11. Maintenance and evaluation of the effectiveness of SSC	OP's.	37.	Import				
<ol> <li>Corrective action when the SSOP's have failed to preve product contamination or adulteration.</li> </ol>	nt direct	38.	Establishment Grounds and Pest Control				
13. Daily records document item 10, 11 and 12 above.	i	39.	Establishment Construction/Maintenance				
Part B - Hazard Analysis and Critical Contro	1	40.	Light				
Point (HACCP) Systems - Basic Requirement	<u>s</u>	41.	Ventilation				
14. Developed and implemented a written HACCP plan.			40 District and Course				
<ol> <li>Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective</li> </ol>			Plumbing and Sewage  Water Supply	:			
<ol> <li>Records documenting implementation and monitoring of the HACCP plan.</li> </ol>		-	44. Dressing Roms/Lavatories  45. Equipment and Utensiis				
<ol> <li>The HACCP plan is signed and dated by the responsible establishment individual.</li> </ol>	blishment individual.						
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	:	46.	Sanitary Operations				
18. Monitoring of HACCP plan.		47.	Employee Hygiene				
19. Verification and validation of HACCP plan.		48.	Condemned Product Control				
Corrective action written in HACCP plan.     Ressessed adequacy of the HACCP plan.			Part F - Inspection Requirements				
Records documenting: the written HACCP plan, monitor critical control points, dates and times of specific event		49.	Government Staffing				
Part C - Economic / Wholesomeness		50.	Daily Inspection Coverage				
23. Labeling - Product Standards		51.	Enforcement	X			
24. Labeling - Net Weights		52.	Humane Handling	<del></del>			
25. General Labeling	(Majakusa)	- <del> </del>	A to add to agree as				
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins	s/Moisture)	53.	Animal Identification				
Part D - Sampling Generic <i>E. coli</i> Testing		54.	Ante Mortem Inspection				
27. Written Procedures		55.	Post Mortem Inspection	X			
28. Sample Collection/Analysis		T					
29. Records			Part G - Other Regulatory Oversight Requirements				
Salmonella Performance Standards - Basic Re	quirements	56.	European Community Directives	0			
30. Corrective Actions		57.	Monthly Review				
31. Reassessment		58.					
32. Written Assurance		59.					

Australia, Est. 648

07-19-04

- A hook used for holding meat cuts during trimming was permanently attached to the boning table with a chain. The employee was observed to allow the hook and chain to fall off the table so that the hook contacted the floor. There was no handy provision for cleaning and sanitizing of the hook when this occurred. The establishment officials took corrective actions. (Regulatory reference: 9 CFR 416.14)
- Heads in the post-mortem inspection area were not clearly identified. The inspection official ordered prompt corrective action. (9 CFR 310.2)

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

mangen H-Chandry 10/10/14

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3.	ESTABLISHMENT NO.	4. NAME OF COUNTRY	
Greenham Tasmania Pty Ltd.,	07 - 21 - 04		716	Australia	
Smithton,	5. NAME OF AUDITO		·)	6. TYPE OF AUDIT	
Tasmania, Australia	Dr. Oto Urbai			v	
					DOUMENT AUDIT
Place an X in the Audit Results block to		mpliar			cable.
Part A - Sanitation Standard Operating Procedure Basic Requirements		udit surts		art D - Continued onomic Sampling	Audit Results
7. Written SSOP		33	3. Scheduled Sample		
8. Records documenting implementation.		34	4. Species Testing		<u> </u>
9. Signed and dated SSOP, by on-site or overall authority.		35	5. Residue		
Sanitation Standard Operating Procedures (SS) Ongoing Requirements	OP)		Part E	Other Requirements	
10. Implementation of SSOP's, including monitoring of imple	ementation. X	36	S. Export		
11. Maintenance and evaluation of the effectiveness of SSC	P's.	37	'. Import		
<ol> <li>Corrective action when the SSOPs have failed to prever product contamination or adulteration.</li> </ol>	nt direct	38	3. Establishment Grounds	and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39	B. Establishment Construc	ction/Maintenance	i
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirement			). Light		
14. Developed and implemented a written HACCP plan .		41	. Ventilation		***************************************
<ol> <li>Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective</li> </ol>	e actions.	42	. Plumbing and Sewage		
Records documenting implementation and monitoring of HACCP plan.	the X	-	Water Supply		
The HACCP plan is signed and dated by the responsible establishment individual.		<u> </u>	. Dressing Roms/Lavato Equipment and Utensils		<u> </u>
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			. Sanitary Operations		
18. Monitoring of HACCP plan.		47	. Employee Hygiene		v
19. Verification and validation of HACCP plan.				- Laboral	. X
20. Corrective action written in HACCP plan.		48	. Condemned Product Co	DUITIO	
21. Reassessed adequacy of the HACCP plan.			Part F - II	nspection Requirements	
22. Records documenting: the written HACCP plan, monitor critical control points, dates and times of specific event		49	. Government Staffing		
Part C - Economic / Wholesomeness		50	. Daily Inspection Covera	ge	
23. Labeling - Product Standards		51	. Enforcement		
24. Labeling - Net Weights		-			X
25. General Labeling		52	. Humane Handling		
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins	/Moisture)	53	. Animal Identification		
Part D - Sampling Generic <i>E. coli</i> Testing		54	. Ante Mortem Inspection		
27. Written Procedures	~ <del>~~~~</del>	55	Post Mortem Inspection		<del></del>
28. Sample Collection/Analysis					
29. Records	1		Part G - Other Regu	latory Oversight Requirement	(S
Salmonella Performance Standards - Basic Rec	quirements	56.	European Community Di	rectives	0
30. Corrective Actions		57.	Monthly Review		
31. Reassessment		58.			
32. Written Assurance		59.			

### Australia.

Est. 716

- One carcass was observed to contact the floor in the cooler and one on the slaughter floor. These deficiencies were corrected immediately by the establishment management (416.14).
- An employee assign for working with edible product was observed performing duties in the inedible product area and not washing his hands after finishing his duties. This deficiency was immediately corrected by the establishment management (416.5a).
- 16/51 Calibration of process-monitoring equipment and their frequencies were not addressed at the CCP2 in the HACCP plan, even though the calibration of process monitoring equipment is being performed. This deficiency was scheduled for correction by the establishment management (417.2).

61. NAME OF AUDITOR

Dr. Oto Lirban

62. AUDITOR SIGNATURE AND DATE
Mangetel #1-Chauthry jojite 4

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY	
G & K. O'Connor,	07 - 12 - 04	1265	Australia	
Pakenham,	5. NAME OF AUDIT	OR(S)	6. TYPE OF AUDIT	
Victoria, Australia	De Ora University		Y	
	Dr. Oto Urba			JMENT AUDIT
Place an X in the Audit Results block t	· ·	· · · · · · · · · · · · · · · · · · ·		ple.
Part A - Sanitation Standard Operating Procedu Basic Requirements	1res (SSOP) Audit Results	Į.	rt D - Continued onomic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample		
8. Records documenting implementation.	7	34. Species Testing		
9. Signed and dated SSOP, by on-site or overall authority		35. Residue		
Sanitation Standard Operating Procedures (S Ongoing Requirements	SOP)	Part E -	Other Requirements	
10. Implementation of SSOP's, including monitoring of im	plementation. X	36. Export		
11. Maintenance and evaluation of the effectiveness of St	SOP's.	37. Import		
<ol> <li>Corrective action when the SSOPs have failed to pre- product contamination or adulteration.</li> </ol>	vent direct	38. Establishment Grounds	and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construc	tion/Maintenance	
Part B - Hazard Analysis and Critical Contr Point (HACCP) Systems - Basic Requirement		40. Light		
14. Developed and implemented a written HACCP plan.		41. Ventilation		
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, correct	tive actions.	42. Plumbing and Sewage		<u> </u>
16. Records documenting implementation and monitoring HACCP plan.	of the X	43. Water Supply		
The HACCP plan is signed and dated by the responsition establishment individual.	ble	44. Dressing Rooms/Lavator 45. Equipment and Utensils		X
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46. Sanitary Operations		
18. Monitoring of HACCP plan.		47. Employee Hygiene		X
19. Verification and validation of HACCP plan.		48. Condemned Product Co	ntrol	
20. Corrective action written in HACCP plan.				
21. Reassessed adequacy of the HACCP plan.		Part F - In	spection Requirements	
22. Records documenting: the written HACCP plan, monit critical control points, dates and times of specific eve		49. Government Staffing		
Part C - Economic / Wholesomeness		50. Daily Inspection Coverag	ge	,
23. Labeling - Product Standards		51. Enforcement		. X
24. Labeling - Net Weights				
25. General Labeling		52. Humane Handling		
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Ski	ns/Moisture)	53. Animal Identification		! 
Part D - Sampling Generic <i>E. coli</i> Testing		54. Ante Mortem Inspection		
27. Written Procedures		55. Post Mortem Inspection		
28. Sample Collection/Analysis		T		
29. Records	· X	Part G - Other Regul	latory Oversight Requirements	
Salmonella Performance Standards - Basic R	equirements	56. European Community Dire	ectives	0
30. Corrective Actions		57. Monthly Review		: 
31. Reassessment		58. NOID		X
32. Written Assurance		59.		

FSIS 5000-6 (04.04.2002)

Page 2 of 2

#### 60. Observation of the Establishment

Australia.

Est. 1265

- 10 Two carcasses were observed to contact the floor in two different coolers. Immediate corrective action was taken by the establishment management (416.13c).
- The establishment employee was observed to operate equipment used for inedible and edible purpose (condensation removing device and rod for changing rails) at the same time. Immediate corrective action was performed by the establishment management (416.14).
- 16/51 The CCP2 did not have verification frequency and CCP3 had two unrelated critical limits (CL). These deficiencies were scheduled for correction (417.2).
- 29/51 There was no clear understanding of the use of m and M for the generic *E. coli* testing, and no proper corrective action was taken when deviation occurs. (310.25).
- 45 Cartons used for edible product were contacting the ceiling in the box storage/preparation room. Immediate corrective action was taken by the establishment management (416.3a).
- 45/51 Plastic container used for edible product carrying metal equipment particles was found in the workshop. Immediate corrective action was performed by the establishment officials (416.3a).
- 47 The establishment employee assign for working with cartons used for edible product was observed contacting the floor with his hands, not washing his hands and continue to perform his duties. Immediate corrective action was taken by the establishment officials (416.5a).
- 58 The Notice of Intent Delist was issued to this establishment for the SSOP, and HACCP/PR deficiencies.

61. NAME OF AUDITOR uDr. Oto Urban

62. AUDITOR SIGNATURE AND DATE,
MICHAELE H - Chaudizy ) [/10/04

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. E	STABLISHMENT NO. 4. NAME OF COUNTRY			
Vili's Cakes, Pies, Pasties, Sausage Rolls	06 - 23 - 04	1	437 Australia			
Mile End South, South Australia	5. NAME OF AUDIT	OR(S)	6. TYPE OF AUDiT			
South Australia	Dr. Oto Urb		X ON-SITE AUDIT DOCUM	MENT AUDIT		
Place an X in the Audit Results block to	indicate noncomp	plian	ce with requirements. Use O if not applicabl	e.		
Part A - Sanitation Standard Operating Procedure			Part D - Continued	Audit		
Basic Requirements	Results	s	Economic Sampling	Results		
7. Written SSOP		33.	Scheduled Sample	: X		
8. Records documenting implementation.		34.	Species Testing	0		
9. Signed and dated SSOP, by on-site or overall authority.	**- <u>-</u> -	35.	Residue	$\cap$		
Sanitation Standard Operating Procedures (SS) Ongoing Requirements	OP)		Part E - Other Requirements			
10. Implementation of SSOP's, including monitoring of imple	ementation.	36.	Export	0		
11. Maintenance and evaluation of the effectiveness of SSC	P's.	37.	Import	0		
<ol> <li>Corrective action when the SSOPs have faled to prever product contamination or adulteration.</li> </ol>	nt direct ;	38.	Establishment Grounds and Pest Control			
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance				
Part B - Hazard Analysis and Critical Control		40.	Light			
Point (HACCP) Systems - Basic Requirement:  14. Developed and implemented a written HACCP plan.	X	41.	Ventilation			
15. Contents of the HACCP list the food safety hazards,	- A	42.	Plumbing and Sewage			
critical control points, critical limits, procedures, corrective.  16. Records documenting implementation and monitoring of		43.	Water Supply			
HACCP plan.		44.	Dressing Roms/Lavatories			
<ol> <li>The HACCP plan is signed and dated by the responsible establishment individual.</li> </ol>		45.	Equipment and Utensils			
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46.	Sanitary Operations			
18. Monitoring of HACCP plan.		47.	Employee Hygiene			
19. Verification and validation of HACCP plan.		48.	Condemned Product Control			
20. Corrective action written in HACCP plan.	!	-				
21. Reassessed adequacy of the HACCP plan.			Part F - Inspection Requirements			
22. Records documenting: the written HACCP plan, monitor critical control points, dates and times of specific event		49.	Government Staffing	X		
Part C - Economic / Wholesomeness	<del></del>	50.	Daily Inspection Coverage	X		
23. Labeling - Product Standards	0	51.	Enforcement	X		
24. Labeling - Net Weights	<u> </u>	-				
25. General Labeling	0	52.	Humane Handling	· 0		
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins	Moisture) O	53.	Animal Identification	0		
Part D - Sampling Generic <i>E. coli</i> Testing		54.	Ante Mortem Inspection	0		
27. Written Procedures	. 0	55.	Post Mortem Inspection	0		
28. Sample Collection/Analysis	0					
29. Records	0	1	Part G - Other Regulatory Oversight Requirements			
Salmonella Performance Standards - Basic Rec		56.	European Community Directives	0		
30. Corrective Actions	: ()	57.	Manthiy Review			
31. Reassessment	0	58.	Delisted	X		
32. Written Assurance	0	59.				
<u> </u>	· · · · · · · · · · · · · · · · · · ·					

FSIS 5000-3104-04 2002 Page 2 of 2

60. Observation of the Establishment

Australia, Est. 1437 06-23-04

14/33/51 This establishment is producing RTE post-lethality exposed product and has failed to attempt to meet the requirements of any of the alternatives for testing for Listeria monocytogenes. Additionally, this establishment has not incorporated the use of the antimicrobial agent or process to suppress or limit the growth of Listeria monocytogenes in its HACCP plan, its SSOPs, or a prerequisite program (417.2).

49/50/51 There is no adequate government staffing and daily Inspection coverage during official operating hours at this establishment. This establishment, while approved for export to the U.S. since 1996, doesn't have any label approval and has never exported to the U.S.

58 The AQIS was asked to remove this establishment from the list of establishments approved for export to the U.S.

61. NAME OF AUDITOR

62. AUDITOR SIGNATURE AND DATE

Dr. Oto Urban

Ms Sally White Director International Equivalence Staff Office of International Affairs Food Safety and Inspection Service Washington, D.C. 20250

#### Dear Ms White

Thank you for your letter of 23 November 2004 accompanying the draft final report of the Food Safety and Inspection Service (FSIS) audit of Australia's meat inspection system from 17 June through 3 August 2004. The Australian Quarantine and Inspection Service (AQIS) values FSIS's assessment of Australia's meat inspection system and will continue to implement strategies to ensure that any shortcomings are remedied. We are grateful for the observation by the US Auditor at the exit meeting on 3 August 2004 in Canberra that the implementation of HACCP in Australian export meat establishments is very good and has been improved since previous audits. We also note the US Auditor's comments at this meeting that the identified deficiencies were, on the whole, minor in nature.

The favourable comments provided by the US Auditor are supported by the audit report. We note from the report that all laboratories and ten of the fourteen slaughter and/or processing establishments reviewed during the 2004 audit were approved without the need for any significant corrective action. Of the four establishments requiring significant action, the three that received a notice of intention to delist have undertaken all required corrective action to AQIS's satisfaction and FSIS has been officially advised of the actions taken. The one establishment identified as requiring delisting during the audit had in fact been suspended by AQIS from the US market for almost eight years prior to the audit and has never exported any product to the US. Failure to communicate the suspension within the thirty-day limit was an administrative oversight. In accordance with the delisting advice received from the US Auditor, this establishment has since been removed from the list of establishments approved to export to the US. AQIS has also taken measures to receive all minor deficiencies identified during the FSIS audit. These measures are identified in a corrective action plan, which will be provided to FSIS separately.

At the time of the 2004 audit, AQIS had only recently implemented the training program for on-plant veterinarians in response to the findings of the 2003 audit. The program will ensure that AQIS on-plant veterinarians receive consistent and comprehensive training in a range of regulatory responsibilities and AQIS considers that it will address any concerns FSIS may have regarding the enforcement abilities of AQIS on-plant veterinarians.

We note from section 6.2 of the report that some concerns arose during the headquarters audit regarding the enforcement of FSIS requirements. AQIS takes any concerns regarding the enforcement of FSIS requirements very seriously. Accordingly, AQIS has recently implemented a process of performance and competency assessment for field staff, which integrates with the training program described above. However, in relation to this component of the audit it has not been possible to assess the need for specific remedial action, as the audit report does not identify specific areas of concern. Clarification of this would assist AQIS to ensure that FSIS requirements continue to be met.

From the information contained in section 16 of the audit report we are unclear of FSIS's assessment of Australia's animal disease control measures. The report states that there are adequate controls in place, but then goes on to identify perceived deficiencies. For example, we concur that heads should be able to be correlated with carcases at post mortem examination and we have taken measures to ensure that this practice continues to be enforced. However, we have some concerns with the audit report assessment of Australian practices in relation to non-ambulatory disabled cattle and incision of atlantal lymph nodes.

Regarding the segregated slaughter and processing of non-ambulatory disabled eattle at Australian establishments authorised to export to the US. AQIS wrote to the FSIS Assistant Administrator. Ms Karen Stuck, explaining Australia's implementation of the new US measures in letters of 15 January and 20 February 2004. Following the identification of this issue by the FSIS auditor at the 3 August exit meeting. AQIS provided further clarification of Australia's system in a letter of 9 August 2004. Considering that Australia has an effective segregation system in place, there is no scientific justification to prevent the slaughter and processing of non-ambulatory disabled cattle for markets other than the US at Australian establishments authorised to export to the US.

The issue of the incision of arlantal lymph nodes was addressed by AQIS in our letter of 19 July 1994 to FSIS International Programs Director, Dr Larry Skinner. We would be grateful for confirmation from FSIS of the continued acceptability of Australia's long established practices with regard to the examination of atlantal lymph nodes.

In conclusion, I would like to thank you for the opportunity to respond to the FSIS audit report and discuss the findings of this report during the teleconference of 14 January 2004 between AQIS and FSIS. AQIS takes the audit report findings very seriously and is confident that the recently implemented corrective measures will adequately address any FSIS concerns and ensure that Australian product exported to the US continues to meet FSIS requirements.

Yours sincerely

Greg Read

Exécutive Manager

Exports

201 January 2004